

January 21, 2003

RE: **ROCK - TENN COMPANY 035-15814-00041**  
TO: Interested Parties / Applicant  
FROM: Paul Dubenetzky  
Chief, Permits Branch  
Office of Air Quality

### **Notice of Decision - Approval - Effective Immediately**

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-6-1(b) require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, ISTA Building, 150 W. Market Street, Suite 618, Indianapolis, Indiana 46204, **within thirty (30) days from the date of this notice**. The filing for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) the date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision or other order for which you seek review by permit number, the name of the applicant, location, the date of this notice, and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for consideration at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

(over)

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of a Title V operating permit or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impracticable to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency  
Administrator, Christine Todd Whitman  
401 M Street  
Washington, D.C. 20406

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures

FNTVOP.WPD  
8-21-02



Governor

Lori F. Kaplan  
Commissioner

# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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## PART 70 OPERATING PERMIT RENEWAL OFFICE OF AIR QUALITY

**Rock-Tenn Company Mill Division  
800A South Romy  
Eaton, Indiana 47338**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T035-15814-00041	
Issued by: Original signed by Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: January 21, 2003  Expiration Date: January 21, 2008

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**SECTION A**

**SOURCE SUMMARY**

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

**A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]**

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The Permittee owns and operates a stationary paperboard mill source.

Responsible Official:	Plant Superintendent
Source Address:	800A South Romy, Eaton, IN 47338
Mailing Address:	800A South Romy, Eaton, IN 47338
General Source Phone Number:	(765) 396-3317
SIC Code:	2631
County Location:	Delaware
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

**A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]**

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This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) Cleaver Brooks natural gas-fired boiler with No. 2 and No. 6 fuel oil as backup fuel, identified as Unit No. 1, constructed in 1969, with a maximum capacity of seventy-five (75) million British thermal units per hour, exhausting to one (1) stack, identified as S<sub>1</sub>.
- (b) One (1) paper machine, identified as Unit No. 2, constructed in 1969, with a maximum process weight rate of 12.5 tons per hour, exhausting to four (4) stacks, identified as S<sub>4a</sub>, S<sub>4b</sub>, S<sub>4c</sub>, and S<sub>4d</sub>.

**A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]**

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This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]

**A.4 Part 70 Permit Applicability [326 IAC 2-7-2]**

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This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

## SECTION B

## GENERAL CONDITIONS

### B.1 Definitions [326 IAC 2-7-1]

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Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

### B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]

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This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

### B.3 Enforceability [326 IAC 2-7-7]

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Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

### B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

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The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

### B.5 Severability [326 IAC 2-7-5(5)]

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The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

### B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

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This permit does not convey any property rights of any sort or any exclusive privilege.

### B.7 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)] [326 IAC 2-7-6(6)]

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- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.
- (c) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.



**B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]**

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- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:
  - (1) Enforcement action;
  - (2) Permit termination, revocation and reissuance, or modification; or
  - (3) Denial of a permit renewal application.
- (b) Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act.
- (c) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (d) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

**B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]**

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- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

**B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]**

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- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the

shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

- (c) The annual compliance certification report shall include the following:
- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
  - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]**

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

**B.12 Emergency Provisions [326 IAC 2-7-16]**

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- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
  - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,  
Compliance Section), or  
Telephone Number: 317-233-5674 (ask for Compliance Section)  
Facsimile Number: 317-233-5967

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(9) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

**B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]**

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- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
  - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
  - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

- (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
- (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

**B.14 Prior Permits Superseded [326 IAC 2-1.1-9.5]**

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- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
  - (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deletedby this permit.
- (b) All previous registrations and permits are superseded by this permit.

**B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]**

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- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

**B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination  
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]**

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- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:
  - (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

**B.17 Permit Renewal [326 IAC 2-7-4]**

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
  - (1) A timely renewal application is one that is:
    - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
    - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

- (2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) **Right to Operate After Application for Renewal** [326 IAC 2-7-3]  
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.
- (d) **United States Environmental Protection Agency Authority** [326 IAC 2-7-8(e)]  
If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

**B.18 Permit Amendment or Modification** [326 IAC 2-7-11] [326 IAC 2-7-12]

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- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015  
  
Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

**B.19 Permit Revision Under Economic Incentives and Other Programs** [326 IAC 2-7-5(8)]  
[326 IAC 2-7-12 (b)(2)]

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- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

**B.20 Operational Flexibility** [326 IAC 2-7-20] [326 IAC 2-7-10.5]

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- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).



- (c) Emission Trades [326 IAC 2-7-20(c)]  
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

**B.21 Source Modification Requirement [326 IAC 2-7-10.5]**

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A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.

**B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2]**

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Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy any records that must be kept under the conditions of this permit;
- (c) Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

**B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]**

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- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

**B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]**

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- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.

## SECTION C

## SOURCE OPERATION CONDITIONS

Entire Source

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

**C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P][326 IAC 6-3-2]**

- (a) Pursuant to 40 CFR Subpart P, the allowable particulate emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- (b) Pursuant to 326 IAC 6-3-2(e)(2), the allowable particulate emissions rate from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply and shall not exceed 0.551 pounds per hour. This condition is not federally enforceable.

**C.2 Opacity [326 IAC 5-1]**

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

**C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]**

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

**C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]**

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.

**C.5 Fugitive Dust Emissions [326 IAC 6-4]**

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

**C.6 Operation of Equipment [326 IAC 2-7-6(6)]**

Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

**C.7 Stack Height [326 IAC 1-7]**

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or

more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4(d), (e), and (f), and 326 IAC 1-7-5(d) are not federally enforceable.

**C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]**

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- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;
    - (B) Removal or demolition contractor; or
    - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to

thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited, pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable.

### **Testing Requirements [326 IAC 2-7-6(1)]**

#### **C.9 Performance Testing [326 IAC 3-6]**

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- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

### **Compliance Requirements [326 IAC 2-1.1-11]**

#### **C.10 Compliance Requirements [326 IAC 2-1.1-11]**

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The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

### **Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]**

#### **C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

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Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within thirty (30) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within thirty (30) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015

Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial thirty (30) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

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**C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]**

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

**Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]**

---

**C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]**

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

The ERP does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

(f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

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**C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]**

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68; or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP).

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.15 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5]  
[326 IAC 2-7-6]

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- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:
  - (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
  - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
  - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
  - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
  - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
  - (4) Failure to take reasonable response steps shall constitute a violation of the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
  - (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.

- (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.
- (3) An automatic measurement was taken when the process was not operating.
- (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

**C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]  
[326 IAC 2-7-6]**

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- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

**C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)]  
[326 IAC 2-6]**

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- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
  - (1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);



- (2) Indicate estimated actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1) from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

**C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]**

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- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

**C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]**

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- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) Reporting periods are based on calendar years.

### **Stratospheric Ozone Protection**

#### **C.20 Compliance with 40 CFR 82 and 326 IAC 22-1**

---

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

## SECTION D.1

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]:

- (a) One (1) Cleaver Brooks natural gas-fired boiler with No. 2 and No. 6 fuel oil as backup fuel, identified as Unit No. 1, constructed in 1969, with a maximum capacity of seventy-five (75) million British thermal units per hour, exhausting to one (1) stack, identified as S<sub>1</sub>.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.1.1 Particulate Matter Limitation (PM) [326 IAC 6-2-3]

Pursuant to 326 IAC 6-2-3 (Particulate Emission Limitations for Sources of Indirect Heating), particulate emissions from the Cleaver Brooks boiler (Unit 1) shall not exceed 0.64 pounds of particulate matter per million British thermal units heat input.

#### D.1.2 Sulfur Dioxide (SO<sub>2</sub>) [326 IAC 7-1.1-1] [326 IAC 7-2-1]

- (a) Pursuant to 326 IAC 7-1.1 (SO<sub>2</sub> Emissions Limitations), the SO<sub>2</sub> emissions from the Cleaver Brooks boiler (Unit 1) shall not exceed five-tenths (0.5) pounds per million British thermal unit heat input when firing No. 2 fuel oil. Pursuant to 326 IAC 7-2-1, compliance shall be demonstrated on a thirty (30) day rolling weighted average. 326 IAC 7-1.1 and 326 IAC 7-2-1 are not federally enforceable.
- (b) Pursuant to 326 IAC 7-1.1 (SO<sub>2</sub> Emissions Limitations), the SO<sub>2</sub> emissions from the Cleaver Brooks boiler (Unit 1) shall not exceed one and six-tenths (1.6) pounds per million British thermal unit heat input when firing No. 6 fuel oil. Pursuant to 326 IAC 7-2-1, compliance shall be demonstrated on a thirty (30) day rolling weighted average. 326 IAC 7-1.1 and 326 IAC 7-2-1 are not federally enforceable.

#### D.1.3 PSD Minor Limit [326 IAC 2-2][40 CFR 52.21]

The Permittee has requested the following limitations:

- (a) The No. 2 fuel oil sulfur content shall be limited to less than 1% by weight.
- (b) The No. 6 fuel oil sulfur content shall be limited to less than 1.3% by weight.
- (c) The No. 2 fuel oil usage shall be limited to less than 3,505 kilogallons per year. If both No. 2 and No. 6 fuel oils are fired during the compliance period, the Permittee shall use the following conversions to ensure compliance with the fuel use limit.
- (1) For each kilogallon of No. 2 fuel oil fired, the No. 2 fuel oil usage limit shall be reduced by 1.00 kilogallons per year.
- (2) For each kilogallon of No. 6 fuel oil fired, the No. 2 fuel oil usage limit shall be reduced by 1.44 kilogallons per year.

These limits are equivalent to emissions of two hundred forty-nine (249) tons of SO<sub>2</sub> per year. These limits are structured such that the source total SO<sub>2</sub> emissions are less than two hundred fifty (250) tons per year. Compliance with this limit ensures PSD minor status.

**D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

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A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control device.

**Compliance Determination Requirements**

**D.1.5 Sulfur Dioxide Emissions and Sulfur Content**

---

Compliance with Conditions D.1.2 and D.1.3 shall be determined utilizing one of the following options.

- (a) Pursuant to 326 IAC 3-7-4, the Permittee shall demonstrate that the sulfur dioxide emissions do not exceed five-tenths (0.5) pounds per million Btu heat input when firing No. 2 fuel oil and one and six-tenths (1.6) pounds per million Btu heat input when firing No. 6 fuel oil by complying with the following. The Permittee shall demonstrate that the No. 2 fuel oil sulfur content does not exceed one percent (1%) by weight and the No. 6 fuel oil sulfur content does not exceed one and three-tenths (1.3%) by weight by complying with the following:
  - (1) Providing vendor analysis of fuel delivered, if accompanied by a vendor certification, or;
  - (2) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.
    - (A) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and
    - (B) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling.
- (b) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from the Cleaver Brooks boiler (Unit 1), using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6.

A determination of noncompliance pursuant to any of the methods specified in (a) or (b) above shall not be refuted by evidence of compliance pursuant to the other method.

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

**D.1.6 Visible Emissions Notations**

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- (a) Visible emission notations of the Cleaver Brooks boiler (Unit 1) stack exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere and firing fuel oil. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

## **Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

### **D.1.7 Record Keeping Requirements**

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- (a) To document compliance with Conditions D.1.2 and D.1.3, the Permittee shall maintain records in accordance with (1) through (6) below.
  - (1) Calendar dates covered in the compliance determination period;
  - (2) Actual fuel oil usage since last compliance determination period and equivalent sulfur dioxide emissions;
  - (3) To certify compliance when burning natural gas only, the Permittee shall maintain records of fuel used.

If the fuel supplier certification is used to demonstrate compliance, when burning alternate fuels and not determining compliance pursuant to 326 IAC 3-7-4, the following, as a minimum, shall be maintained:

- (4) Fuel supplier certifications;
- (5) The name of the fuel supplier; and
- (6) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.

The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years, or longer if specified elsewhere in this permit, from the date of the monitoring sample, measurement, or report. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.

- (b) To document compliance with Condition D.1.3, the Permittee shall maintain records of the amount No. 2 and No. 6 fuel oils fired by the Cleaver Brooks boiler (Unit 1).
- (c) To document compliance with Condition D.1.6, the Permittee shall maintain records of visible emission notations of the Cleaver Brooks boiler (Unit 1) stack exhaust once per shift when not firing natural gas.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

### **D.1.8 Reporting Requirements**

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The natural gas fired boiler certification shall be submitted to the address listed in Section C - General Reporting Requirements, using the reporting form located at the end of this permit, or their equivalent, within thirty (30) days after the end of the six (6) month period being reported. The

report submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

## SECTION D.2

## FACILITY CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]:

- (b) One (1) paper machine, identified as Unit No. 2, constructed in 1969, with a maximum process weight rate of 12.5 tons per hour, exhausting to four (4) stacks, identified as S<sub>4a</sub>, S<sub>4b</sub>, S<sub>4c</sub>, and S<sub>4d</sub>.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.2.1 Particulate Emission Limitations [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the paper machine (Unit 2) shall not exceed 22.26 pounds per hour when operating at a process weight rate of 12.5 tons per hour. This limitation was calculated using the following equation.

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and  
P = process weight rate in tons per hour

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

### PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Rock-Tenn Company Mill Division  
Source Address: 800A South Romy, Eaton, Indiana 47338  
Mailing Address: 800A South Romy, Eaton, Indiana 47338  
Part 70 Permit No.: T035-15814-00041

**This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.**

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify) \_\_\_\_\_

9 Report (specify) \_\_\_\_\_

9 Notification (specify) \_\_\_\_\_

9 Affidavit (specify) \_\_\_\_\_

9 Other (specify) \_\_\_\_\_

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Phone:

Date:



**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE BRANCH  
100 North Senate Avenue  
P.O. Box 6015  
Indianapolis, Indiana 46206-6015  
Phone: 317-233-5674  
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT  
EMERGENCY OCCURRENCE REPORT**

Source Name: Rock-Tenn Company Mill Division  
Source Address: 800A South Romy, Eaton, Indiana 47338  
Mailing Address: 800A South Romy, Eaton, Indiana 47338  
Part 70 Permit No.: T035-15814-00041

**This form consists of 2 pages**

**Page 1 of 2**

- 9** This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
  - The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:

Date/Time Emergency was corrected:

Was the facility being properly operated at the time of the emergency?    Y    N  
Describe:

Type of Pollutants Emitted: TSP, PM-10, SO<sub>2</sub>, VOC, NO<sub>x</sub>, CO, Pb, other:

Estimated amount of pollutant(s) emitted during emergency:

Describe the steps taken to mitigate the problem:

Describe the corrective actions/response steps taken:

Describe the measures taken to minimize emissions:

If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
Compliance Data Section**

**PART 70 OPERATING PERMIT  
SEMI-ANNUAL NATURAL GAS FIRED BOILER CERTIFICATION**

Source Name: Rock-Tenn Company Mill Division  
Source Address: 800A South Romy, Eaton, Indiana 47338  
Mailing Address: 800A South Romy, Eaton, Indiana 47338  
Part 70 Permit No.: T035-15814-00041

9 Natural Gas Only

9 Alternate Fuel burned

From: \_\_\_\_\_ To: \_\_\_\_\_

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Phone:

Date:

A certification by the responsible official as defined by 326 IAC 2-7-1(34) is required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
Compliance Data Section**

**PART 70 OPERATING PERMIT  
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Rock-Tenn Company Mill Division  
Source Address: 800A South Romy, Eaton, Indiana 47338  
Mailing Address: 800A South Romy, Eaton, Indiana 47338  
Part 70 Permit No.: T035-15814-00041

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

Page 1 of 2

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

**Permit Requirement** (specify permit condition #)

**Date of Deviation:**

**Duration of Deviation:**

**Number of Deviations:**

**Probable Cause of Deviation:**

**Response Steps Taken:**

**Permit Requirement** (specify permit condition #)

**Date of Deviation:**

**Duration of Deviation:**

**Number of Deviations:**

**Probable Cause of Deviation:**

**Response Steps Taken:**

<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

Form Completed By: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**January 21, 2003**

**Indiana Department of Environmental Management  
Office of Air Quality**

**Technical Support Document (TSD) for a Part 70 Operating Permit  
Renewal**

**Source Background and Description**

Source Name: Rock-Tenn Company Mill Division  
Source Location: 800A South Romy, Eaton, Indiana 47338  
County: Delaware  
SIC Code: 2631  
Operation Permit No.: T035-15814-00041  
Permit Reviewer: ERG/KC

The Office of Air Quality (OAQ) has reviewed a Part 70 permit application from Rock-Tenn Company Mill Division relating to the operation of a paperboard mill source.

**Permitted Emission Units and Pollution Control Equipment**

The source consists of the following permitted emission units and pollution control devices:

- (a) One (1) Cleaver Brooks natural gas-fired boiler with No. 2 and No. 6 fuel oil as backup fuel, identified as Unit No. 1, constructed in 1969, with a maximum capacity of seventy-five (75) million British thermal units per hour, exhausting to one (1) stack, identified as  $S_1$ .
- (b) One (1) paper machine, identified as Unit No. 2, constructed in 1969, with a maximum process weight rate of 12.5 tons per hour, exhausting to four (4) stacks, identified as  $S_{4a}$ ,  $S_{4b}$ ,  $S_{4c}$ , and  $S_{4d}$ .

**Unpermitted Emission Units and Pollution Control Equipment**

There are no unpermitted facilities operating at this source during this review process.

**New Emission Units and Pollution Control Equipment Receiving Advanced Source Modification Approval**

There are no new emission units and pollution control equipment receiving advanced source modification approval at this source during this review process.

**Insignificant Activities**

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]

- (b) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- (c) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment cutting torches, soldering equipment, welding equipment.
- (d) Activities associated with the treatment of wastewater streams with a oil and grease content less than or equal to 1% by volume.
- (e) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (f) Stationary fire pumps.
- (g) Emission units with PM and PM10 emissions less than five (5) tons per year, SO<sub>2</sub>, NO<sub>x</sub>, and VOC emissions less than ten (10) tons per year, CO emissions less than twenty-five (25) tons per year, lead emissions less than two-tenths (0.2) tons per year, single HAP emissions less than one (1) ton per year, and combination of HAPs emissions less than two and a half (2.5) tons per year:
  - (1) Wastewater treatment using a biocide;
  - (2) Hydro pulper (paper mill) - wastewater input;
  - (3) Stock cleaning - physical process, reject material is sent to landfill;
  - (4) Paper machine dryers - boiler steam applied;
  - (5) Calendar stack - rolled to customer needs
  - (6) Rewinder - slitter and rerolled; and
  - (7) Product storage (fuel oil) - 268,000 gallons of No. 2.

### Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

T035-7582-00041, issued March 18, 1998.

All conditions from previous approvals were incorporated into this Part 70 permit except:

Conditions Not Included: Condition D.1.2 (Fuel Limitation) of T035-7582-00041, issued March 18, 1998. This condition provided the fuel use limitations necessary for the source to be a minor source under PSD.

Reason Not Included: This condition was reorganized for clarification purposes. Instead of listing two fuel usage limits, one for No. 2 fuel oil and one for No. 6 fuel oil, and providing two equivalency factors, the limit was reorganized to include only the limit for No. 2 fuel oil. An equivalency factor was then provided to equate kilogallons of No. 6 fuel oil to kilogallons of No. 2 fuel oil. The No. 2 fuel oil usage limit was also raised to allow for emissions of 249 tons per year of SO<sub>2</sub> since the original No. 6 fuel oil limit allowed for emissions of 249 tons per year while the original No. 2 fuel oil limit did not.

Condition Not Included: Conditions D.2.3 and D.2.4 of T035-7582-00041, issued March 18, 1998. Condition D.2.3 required visible emissions notations for the paper machine and D.2.4 required records to be kept of the visible emissions notations.

Reason Not Included: Visible emissions notations are not required for the paper machine because no NSPS or NESHAP applies to the paper machine, there is no control device, actual particulate emissions are less than 25 tons per year, and there is no limit to keep the unit out of an applicable requirement.

Conditions Not Included: Conditions D.3.1 through D.3.3, D.4.1 through D.4.4, D.5.1 through D.5.5 and D.6.1 through D.6.4, issued March 18, 1998. These conditions provided emission limitations, compliance determination requirements, compliance monitoring requirements, and record keeping requirements for the following groups of units:

- (1) Seven (7) line machines, each consisting of one (1) recycled paperboard strip fabricator and one (1) partition assembler, identified as Unit No. 3, using the cyclone from the scrap suction system (Unit No. 6) as control, exhausting to one (1) stack (S<sub>3</sub>).
- (2) Four (4) low pressure steam electronically fired adhesive applicators attached to each of four (4) of the seven (7) line machine partition assemblers, for a total of sixteen (16) applicators, identified as Unit No. 4, with a maximum capacity of 4.9 pounds per hour (lb/hr).
- (3) One (1) spray booth utilizing a Binks high volume, low pressure air atomization applicator and a dry filter for overspray control, identified as Unit No. 5, with a maximum capacity of 24.5 pounds per hour (lb/hr), exhausting to one (1) stack (S<sub>2</sub>).
- (4) One (1) scrap suction system, including a seventeen (17) inch diameter piping system, a 13 foot diameter roof top cyclone, and an automatic scrap paper baler, identified as Unit No. 6, exhausting to one (1) stack (S<sub>3</sub>).

Reason Not Included: Conditions D.3.1 through D.3.3, D.4.1 through D.4.4, D.5.1 through D.5.5 and D.6.1 through D.6.4 were not included in this Part 70 Permit renewal because the units that these conditions are applicable to (units listed as (1) through (4) above) have been removed from the source.

#### **Enforcement Issue**

- (a) IDEM is aware that the Part 70 permit renewal application was received late. The original Part 70 permit was issued March 18, 1998. The renewal application was received July 1, 2002.
- (b) IDEM is reviewing this matter and will take appropriate action.

#### **Recommendation**

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit renewal application for the purposes of this review was received on July 1, 2002.

There was no notice of completeness letter mailed to the source.



## Emission Calculations

See Appendix A of this document for detailed emissions calculations (pages 1 through 8).

## Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source, excluding the emission limits that were contained in the previous Part 70 permit.

Pollutant	Potential To Emit (tons/year)
PM	35.8
PM-10	35.8
SO <sub>2</sub>	482.4
VOC	12.4
CO	27.6
NO <sub>x</sub>	130.0

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential To Emit (tons/year)
Ethylene Thiorea	0.27
Benzene	6.889x10 <sup>-4</sup>
Dichlorobenzene	3.942x10 <sup>-4</sup>
Formaldehyde	2.464x10 <sup>-2</sup>
Hexane	5.913x10 <sup>-1</sup>
Toluene	1.117x10 <sup>-3</sup>
Lead	3.12x10 <sup>-3</sup>
Cadmium	1.37x10 <sup>-3</sup>
Chromium	1.45x10 <sup>-3</sup>
Manganese	2.09x10 <sup>-3</sup>
Nickel	1.68x10 <sup>-3</sup>
Arsenic	1.31x10 <sup>-3</sup>
Beryllium	9.89x10 <sup>-4</sup>
Mercury	9.86x10 <sup>-4</sup>
Selenium	4.93x10 <sup>-3</sup>
TOTAL	0.90

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of SO<sub>2</sub> and NO<sub>x</sub> are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) Fugitive Emissions  
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

## Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2000 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	7
PM-10	7
SO <sub>2</sub>	0
VOC	6
CO	17
NO <sub>x</sub>	20
HAP	--

### Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 operating permit.

	Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
Cleaver Brooks Boiler (Unit 1)	18.5	18.5	Less than 249 (326 IAC 2-2)	1.4	8.76	67.1	Neg
Paper Machine (Unit 2)	0	0	0	9.69	0	0	0.27
Total Emissions	18.5	18.5	Less than 250	11.09	8.76	67.1	0.3

Neg = Negligible

### County Attainment Status

The source is located in Delaware County.

Pollutant	Status
PM-10	Attainment
SO <sub>2</sub>	Attainment
NO <sub>2</sub>	Attainment
Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Delaware County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Delaware County has been classified as attainment or unclassifiable for all criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (c) Fugitive Emissions  
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect

on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

### **Part 70 Permit Conditions**

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

### **Federal Rule Applicability**

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) The Cleaver Brooks boiler (Unit 1) is not subject to the requirements of 40 CFR 60, Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units) because this boiler was constructed in 1969 which is prior to the June 9, 1989 applicability date. On June 13, 1996 a permit was issued to change the main fuel from natural gas to No. 6 fuel oil. On March 18, 1998, the Part 70 Permit was issued that changed the main fuel to natural gas with No. 2 and No. 6 fuel oil as backup. These changes do not constitute modifications pursuant to 40 CFR 60.14(e)(4). 40 CFR 60.14(e)(4) states that the use of an alternative fuel shall not, by itself, be considered a modification if "the existing facility was designed to accommodate that alternative use. A facility shall be considered to be designed to accommodate an alternative fuel or raw material if that use could be accomplished under the facility's construction specifications." The Cleaver Brooks boiler (Unit 1) was designed to fire both natural gas and fuel oil when it was constructed in 1969. The June 13, 1996 permit and the Part 70 permit issued March 18, 1998 switched the primary fuel from natural gas to fuel oil and then back again.
- (c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.
- (d) This source is not subject to the provisions of 40 CFR 64, Compliance Assurance Monitoring. In order for this rule to apply, a specific emissions unit must meet three criteria for a given pollutant: 1) the unit is subject to an emission limitation or standard for the applicable regulated air pollutant, 2) the unit uses a control device to achieve compliance with any such emission limitation or standard, and, 3) the unit has potential pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than 100 percent of the amount required for a source to be classified as a major source. The Cleaver Brooks boiler (Unit 1) has the potential to emit greater than one hundred (100) tons per year of both SO<sub>2</sub> and NO<sub>x</sub>. However, this unit does not use a control device to comply with any emission limits. Therefore the source is not subject to the provisions of 40 CFR 64, Compliance Assurance Monitoring.
- (e) Although this source belongs to the Paper and Other Web Coating source category (that will be regulated by 40 CFR 63, Subpart JJJJ when it is final), the source is not subject to the requirements of Section 112(j) of the Clean Air Act (40 CFR Part 63.50 through 63.56) because the source is not a major source of HAPs.

### **State Rule Applicability - Entire Source**

#### **326 IAC 2-2 (Prevention of Significant Deterioration)**

The source was an existing major source at the time PSD rules came into effect. There has been no new construction at the source. The source has changed fuels used in the boilers. However, because the boilers were able to accommodate these fuels prior to January 6, 1975, the fuel switches are not considered modifications under PSD rules. Therefore, the source has not been subject to the PSD requirements. In the original Title V permit (T035-7582-00041) the source has requested a limit on fuel usage in order to be a minor PSD source. This Title V permit renewal also contains the fuel use limits to maintain minor PSD source status.

The Permittee shall comply with the following limitations:

- (a) The No. 2 fuel oil sulfur content shall be limited to less than 1% by weight.
- (b) The No. 6 fuel oil sulfur content shall be limited to less than 1.3% by weight.
- (c) The No. 2 fuel oil usage shall be limited to less than 3,505 kilogallons per year. If both No. 2 and No. 6 fuel oils are fired during the compliance period, the Permittee shall use the following conversions to ensure compliance with the fuel use limit.
  - (1) For each kilogallon of No. 2 fuel oil fired, the No. 2 fuel oil usage limit shall be reduced by 1.00 kilogallons per year.
  - (2) For each kilogallon of No. 6 fuel oil fired, the No. 2 fuel oil usage limit shall be reduced by 1.44 kilogallons per year.

These limits are equivalent to emissions of two hundred forty-nine (249) tons of SO<sub>2</sub> per year. These limits are structured such that the source total SO<sub>2</sub> emissions are less than two hundred fifty (250) tons per year. Compliance with this limit ensures PSD minor status.

#### **326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants)**

This source is not subject to the requirements of 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants) because the source does not have the potential to emit greater than ten (10) tons per year of a single HAP or greater than twenty-five (25) tons per year of any combination of HAPs and no facility at the source was constructed after July 27, 1997.

#### **326 IAC 2-6 (Emission Reporting)**

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of SO<sub>2</sub> and NO<sub>x</sub>. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

#### **326 IAC 5-1 (Opacity Limitations)**

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9

or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6-4 (Fugitive Dust Emissions)

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

This source is not subject to the requirements of 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations) because it was constructed in 1969 and does not have potential fugitive particulate matter emissions of twenty-five (25) tons per year or more.

**State Rule Applicability - Cleaver Brooks Boiler (Unit 1)**

326 IAC 6-2-3 (Particulate Emission Limitations for Sources of Indirect Heating)

The Cleaver Brooks boiler (Unit 1) is subject to the requirements of 326 IAC 6-2-3 (Particulate Emission Limitations for Sources of Indirect Heating) because it is located in Delaware County and was constructed in 1969 which is prior to September 21, 1983. Pursuant to this rule, the particulate matter (PM) emissions from the Cleaver Brooks boiler (Unit 1) shall not exceed 0.64 pounds per million British thermal units. This limit was calculated using the following equation:

$$Pt = \frac{C \times a \times h}{76.5 \times Q^{0.75} \times N^{0.25}}$$

Where C = 50 u/m<sup>3</sup>

Pt = pounds of particulate matter emitted per million Btu heat input (lb/MMBtu)

Q = total source maximum operating capacity rating (Q = 75 MMBtu/hr)

N = number of stacks (N = 1)

a = plume rise factor (a = 0.67)

h = stack height (h = 37 ft)

326 IAC 7-1.1-2 (Sulfur Dioxide Emission Limitation)

The Cleaver Brooks boiler (Unit 1) is subject to the requirements of 326 IAC 7-1.1-2 (Sulfur Dioxide Emission Limitation) because it has the potential to emit greater than twenty-five (25) tons per year of SO<sub>2</sub>. Pursuant to this rule, the SO<sub>2</sub> emissions from firing No. 2 fuel oil shall be limited to five-tenths (0.5) pounds per million British thermal units and the SO<sub>2</sub> emissions from firing No. 6 fuel oil shall be limited to one and six-tenths (1.6) pounds per million British thermal units.

326 IAC 7-2-1 (Sulfur Dioxide Compliance Reporting)

326 IAC 7-2-1 (Sulfur Dioxide Compliance Reporting) applies to the Cleaver Brooks boiler (Unit 1) because 326 IAC 7-1.1 applies to the boiler. Pursuant to this rule, a quarterly report shall be submitted including the average sulfur content, heat content, the SO<sub>2</sub> emission rate in pounds per million British thermal units per hour, and the fuel oil consumption. Fuel sampling and analysis data shall be collected pursuant to the procedures specified in 326 IAC 3-3-4 for oil combustion.

326 IAC 10-1 (Nitrogen Oxides Control in Clark and Floyd Counties)

The Cleaver Brooks boiler (Unit 1) is not subject to the requirements of 326 IAC 10-1 (Nitrogen Oxides Control in Clark and Floyd Counties) even though it has the potential to emit greater than one hundred (100) tons per year of NO<sub>x</sub> because it not located in Clark or Floyd Counties.

326 IAC 10-3 (Nitrogen Oxide Reduction Program for Specific Source Categories)

The Cleaver Brooks boiler (Unit 1) is not subject to the requirements of 326 IAC 10-3 (Nitrogen Oxide Reduction Program for Specific Source Categories) because the boiler is not one of the

specific source categories listed in 326 IAC 10-3-1(a)(1) and it is not specifically listed in 326 IAC 10-3-1(a)(2).

### **State Rule Applicability - Paper Machine (Unit 2)**

#### **326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)**

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from the paper machine (Unit 2) shall not exceed an emission rate of 22.26 pounds per hour when operating at the process weight rate of 12.5 tons per hour. This limitation was calculated using the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

#### **326 IAC 8-1-6 (New Facilities; General Reduction Requirements)**

The paper machine (Unit 2) is not subject to the requirements of 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) because it was constructed in 1969 which is before the applicability date, January 1, 1980, of this rule and it has the potential to emit less than twenty-five (25) tons per year.

#### **326 IAC 8-2-5 (Paper Coating Operations)**

The paper machine (Unit 2) is not subject to the requirements of 326 IAC 8-2-5 (Paper Coating Operations) because it is not engaged in web coating or paper saturation processes (paper coating).

#### **326 IAC 8-6 (Organic Solvent Emission Limitations)**

The paper machine (Unit 2) is not subject to the requirements of 326 IAC 8-6 (Organic Solvent Emission Limitations) because the source was constructed in 1969 in Delaware County and the source does not have the potential to emit one hundred (100) tons of VOC per year.

### **Testing Requirements**

Testing was not required in the original Part 70 Permit (T035-7582-00041) and is not required in this Part 70 Permit Renewal. Testing is not required for the Cleaver Brooks boiler (Unit 1) even though it has the potential to emit greater than 40% of the source's total potential to emit, before controls, of SO<sub>2</sub> and NO<sub>x</sub>, the major pollutants, because compliance with 326 IAC 2-2 (Prevention of Significant Deterioration) can be determined through fuel use records. Testing would not provide any additional compliance determination information. Testing is not required for the paper machine (Unit 2) because there is no evidence that the paper machine (Unit 2) is not out of compliance with 326 IAC 6-3-2, the only applicable rule.

### **Compliance Requirements**

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

The Cleaver Brooks boiler (Unit 1) has applicable compliance monitoring conditions as specified below:

Once per shift visible emissions notations of the Cleaver Brooks boiler (Unit 1) stack exhaust shall be performed during normal daylight operations when the unit is firing fuel oil. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

These monitoring conditions are necessary because the Cleaver Brooks boiler (Unit 1) must operate properly to ensure compliance with 326 IAC 2-2 (Prevention of Significant Deterioration), 40 CFR 52.21, 326 IAC 6-2-3 (Particulate Emission Limitations for Sources of Indirect Heating), 326 IAC 7-1.1 (SO<sub>2</sub> Emission Limitations), and 326 IAC 2-7 (Part 70).

## **Conclusion**

The operation of this paperboard mill source shall be subject to the conditions of the attached proposed Part 70 Permit No. T035-15814-00041.

**Appendix A: Emissions Calculations**

Page 1 of 8

**Natural Gas Combustion Only**

**MM BTU/HR <100**

**Cleaver Brooks Boiler (Unit 1)**

**Company Name: Rock-Tenn Company Mill Division**

**Address City IN Zip: 800A South Romy, Eaton, IN 47338**

**Permit Number: T035-15814-00041**

**Plant ID: 035-00041**

**Reviewer: ERG/KC**

**Date: 08/19/2002**

*The Cleaver Brooks boiler (Unit 1) has a maximum capacity of 75 MMBtu/hr and fires No. 2 and No. 6 fuel oil as backup.*

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMCF/yr

75.0

657.0

Pollutant						
Emission Factor in lb/MMCF	PM*	PM10*	SO2	NOx	VOC	CO
	7.6	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	2.5	2.5	0.2	32.9	1.8	27.6

\*\*Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03

(SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton



**Appendix A: Emissions Calculations**

Page 2 of 8

**Natural Gas Combustion Only**

**MM BTU/HR <100**

**Cleaver Brooks Boiler (Unit 1)**

**HAPs Emissions**

**Company Name: Rock-Tenn Company Mill Division**

**Address City IN Zip: 800A South Romy, Eaton, IN 47338**

**Permit Number: T035-15814-00041**

**Plant ID: 035-00041**

**Reviewer: ERG/KC**

**Date: 08/19/2002**

**HAPs - Organics**

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	6.899E-04	3.942E-04	2.464E-02	5.913E-01	1.117E-03

**HAPs - Metals**

	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	1.643E-04	3.614E-04	4.599E-04	1.248E-04	6.899E-04

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emissions Calculations**  
**Commercial/Institutional/Residential Combustors (< 100 mmBtu/hr)**

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**#1 and #2 Fuel Oil**

**Cleaver Brooks Boiler (Unit 1)**

**Company Name: Rock-Tenn Company Mill Division**

**Address City IN Zip: 800A South Romy, Eaton, IN 47338**

**Permit Number: T035-15814-00041**

**Plant ID: 035-00041**

**Reviewer: ERG/KC**

**Date: 08/19/2002**

*The Cleaver Brooks boiler (Unit 1) has a maximum capacity of 75 MMBtu/hr and fires No. 2 and No. 6 fuel oil as backup.*

Heat Input Capacity	Potential Throughput	S = Weight % Sulfur
MMBtu/hr	kgals/year	1
75	4692.85714	

		Pollutant			
Emission Factor in lb/kgal	PM*	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO
	2	142 (142.0S)	20	0.34	5
Potential Emission in tons/yr	4.69	333.19	46.93	0.80	11.73

**Methodology**

1 gallon of No. 2 Fuel Oil has a heating value of 140,000 Btu

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.140 MM Btu

Emission Factors are from AP 42, Tables 1.3-1, 1.3-2, and 1.3-3 (SCC 1-03-005-01/02/03) Supplement E 9/98 (see erata file)

\*PM emission factor is filterable PM only. Condensable PM emission factor is 1.3 lb/kgal.

Emission (tons/yr) = Throughput (kgals/ yr) x Emission Factor (lb/kgal)/2,000 lb/ton

**Appendix A: Emissions Calculations**  
**Commercial/Institutional/Residential Combustors (< 100 mmBtu/hr)**

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**#1 and #2 Fuel Oil**

**Cleaver Brooks Boiler (Unit 1)**

**Company Name: Rock-Tenn Company Mill Division**

**Address City IN Zip: 800A South Romy, Eaton, IN 47338**

**Permit Number: T035-15814-00041**

**Plant ID: 035-00041**

**Reviewer: ERG/KC**

**Date: 08/19/2002**

**HAPs - Metals**

Emission Factor in lb/mmBtu	Arsenic 4.00E-06	Beryllium 3.00E-06	Cadmium 3.00E-06	Chromium 3.00E-06	Lead 9.00E-06
Potential Emission in tons/yr	1.31E-03	9.86E-04	9.86E-04	9.86E-04	2.96E-03

**HAPs - Metals (continued)**

Emission Factor in lb/mmBtu	Mercury 3.00E-06	Manganese 6.00E-06	Nickel 3.00E-06	Selenium 1.50E-05
Potential Emission in tons/yr	9.86E-04	1.97E-03	9.86E-04	4.93E-03

**Methodology**

No data was available in AP-42 for organic HAPs.

Potential Emissions (tons/year) = Throughput (mmBtu/hr)\*Emission Factor (lb/mmBtu)\*8,760 hrs/yr / 2,000 lb/ton

**Appendix A: Emissions Calculations**  
**Commercial/Institutional/Residential Combustors (< 100 mmBtu/hr)**  
**#5 and #6 Fuel Oil**

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**Cleaver Brooks Boiler (Unit 1)**  
**Company Name: Rock-Tenn Company Mill Division**  
**Address City IN Zip: 800A South Romy, Eaton, IN 47338**  
**Permit Number: T035-15814-00041**  
**Plant ID: 035-00041**  
**Reviewer: ERG/KC**  
**Date: 08/19/2002**

*The Cleaver Brooks boiler (Unit 1) has a maximum capacity of 75 MMBtu/hr and fires No. 2 and No. 6 fuel oil as backup.*

Heat Input Capacity	Potential Throughput	
MMBtu/hr	kgals/year	S = Weight % Sulfur
		1.3
75.00	4726.62	

Emission Factor in lb/kgal	Pollutant				
	PM**	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO
	15.2	204.1	55.0	1.13	5.0
	<i>*see below</i>	<i>(157S)</i>			
Potential Emission in tons/yr	35.8	482.4	130.0	2.7	11.8

\*Particulate Matter emission factor for #5 fuel oil is 10.0 lb/kgal

\*Particulate Matter emission factor for #6 fuel oil is 9.19(s) + 3.22 lb/kgal

\*\*PM emission factor is filterable PM only. Condensable PM emission factor is 1.5 lb/kgal.

### Methodology

1 gallon of #5 Fuel oil has a heating value of 139,000 Btu

1 gallon of #6 Fuel oil has a heating value of 150,000 Btu

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.139 MMBtu

Emission Factors are from AP 42 Tables 1.3-1, 1.3-2 and 1.3-3 (SCC 1-03-004-02/03, 1-02-004-02/03, and 1-03-004-04)

(AP-42 Supplement E 9/98)

Emission (tons/yr) = Throughput (kgals/year) x Emission Factor (lb/kgal)/2,000 lb/ton

No data are available for HAPs emissions calculations

**Appendix A: Emissions Calculations**  
**Commercial/Institutional/Residential Combustors (< 100 mmBtu/hr)**

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**#1 and #2 Fuel Oil**

**Cleaver Brooks Boiler (Unit 1) Limited Emissions**

**Company Name: Rock-Tenn Company Mill Division**

**Address City IN Zip: 800A South Romy, Eaton, IN 47338**

**Permit Number: T035-15814-00041**

**Plant ID: 035-00041**

**Reviewer: ERG/KC**

**Date: 08/19/2002**

*The Cleaver Brooks boiler (Unit 1) has a maximum capacity of 75 MMBtu/hr and fires No. 2 and No. 6 fuel oil as backup.*

Limited Throughput  
kgals/year

S = Weight % Sulfur  
1

3,505

		Pollutant			
	PM*	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO
Emission Factor in lb/kgal	2	142 (142.0S)	20	0.34	5
Potential Emission in tons/yr	3.51	248.86	35.05	0.60	8.76

**Methodology**

1 gallon of No. 2 Fuel Oil has a heating value of 140,000 Btu

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.140 MM Btu

Emission Factors are from AP 42, Tables 1.3-1, 1.3-2, and 1.3-3 (SCC 1-03-005-01/02/03) Supplement E 9/98 (see erata file)

\*PM emission factor is filterable PM only. Condensable PM emission factor is 1.3 lb/kgal.

Emission (tons/yr) = Throughput (kgals/ yr) x Emission Factor (lb/kgal)/2,000 lb/ton

**Appendix A: Emissions Calculations**  
**Commercial/Institutional/Residential Combustors (< 100 mmBtu/hr)**  
**#5 and #6 Fuel Oil**

Page 8 of 8

**Cleaver Brooks Boiler (Unit 1) Limited Emissions**  
**Company Name: Rock-Tenn Company Mill Division**  
**Address City IN Zip: 800A South Romy, Eaton, IN 47338**  
**Permit Number: T035-15814-00041**  
**Plant ID: 035-00041**  
**Reviewer: ERG/KC**  
**Date: 08/19/2002**

*The Cleaver Brooks boiler (Unit 1) has a maximum capacity of 75 MMBtu/hr and fires No. 2 and No. 6 fuel oil as backup.*

Limited Throughput  
kgals/year                      S = Weight % Sulfur  

1.3
-----

  
2,439

Emission Factor in lb/kgal	Pollutant				
	PM**	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO
	15.2	204.1	55.0	1.13	5.0
	<i>*see below</i>	<i>(157S)</i>			
Potential Emission in tons/yr	18.5	248.9	67.1	1.4	6.1

\*Particulate Matter emission factor for #5 fuel oil is 10.0 lb/kgal

\*Particulate Matter emission factor for #6 fuel oil is 9.19(s) + 3.22 lb/kgal

\*\*PM emission factor is filterable PM only. Condensable PM emission factor is 1.5 lb/kgal.

**Methodology**

1 gallon of #5 Fuel oil has a heating value of 139,000 Btu

1 gallon of #6 Fuel oil has a heating value of 150,000 Btu

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.139 MMBtu

Emission Factors are from AP 42 Tables 1.3-1, 1.3-2 and 1.3-3 (SCC 1-03-004-02/03, 1-02-004-02/03, and 1-03-004-04)

(AP-42 Supplement E 9/98)

Emission (tons/yr) = Throughput (kgals/year) x Emission Factor (lb/kgal)/2,000 lb/ton

No data are available for HAPs emissions calculations